

1 John Burton, State Bar No. 86029
THE LAW OFFICES OF JOHN BURTON
2 65 North Raymond Avenue, Suite 300
Pasadena, California 91103

3 Telephone: (626) 449-8300
4 Facsimile: (626) 449-4417
E-Mail: jb@JohnBurtonLaw.com

5 Attorneys for Plaintiffs Francisco and Bellermina Rodriguez, Individually and as
6 Successors in Interest of Edwin Rodriguez, Deceased

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10
11 FRANCISCO and BELLERMINDA
12 RODRIGUEZ, Individually and as
13 Successors in Interest of EDWIN
RODRIGUEZ, Deceased,

14 Plaintiffs,

15 v.

16 COUNTY OF SANTA CLARA,
17 SANTA CLARA VALLEY MEDICAL
CENTER, SANTA CLARA COUNTY
18 SHERIFF'S OFFICE, DEPUTY
SHERIFFS JENSEN #1756,
19 PALINOV #1864, CLARK #1676,
and FERNANDES #2013, CITY OF
20 CAMPBELL, CAMPBELL POLICE
DEPARTMENT, POLICE OFFICER
21 GARY BERG #63, and DOES 1 to
20,

22 Defendants.

Case No. C 10-735 JW

STIPULATION RE SERVICE, TIME FOR
RESPONSIVE PLEADINGS AND
MEDIATION; ORDER

23
24 TO THE HONORABLE COURT:

25 Counsel for all parties have been in contact with one another since the filing of the
26 case and have informally exchanged information. All parties have either been served or
27 have agreed to waive service.

1 The parties have decided that an early mediation is appropriate in this case. A
 2 mediation has been set for July 19, 2010 with Harris Weinberg, Esq., in San Francisco.
 3 The parties have filed a stipulation to private ADR, with a proposed completion date of
 4 July 20, 2010. The Court has entered an order thereon, and set a case management
 5 conference on September 13, 2010, at 10:00 a.m.

6 Given the foregoing circumstances, the parties stipulate and agree, should the
 7 Court deem it appropriate and convenient, that each defendant shall be deemed to have
 8 been served or to have waived service. If the case resolves at the mediation, the parties
 9 shall promptly notify the Court and request the setting of an appropriate date for
 10 completion of the settlement and dismissal of the action. If the case does not resolve,
 11 each defendant shall have until August 13, 2010 to file a response to the complaint.

12 Dated: June 23, 2010

THE LAW OFFICES OF JOHN BURTON

13 By: /S/
 14 John Burton
 Attorneys for Plaintiffs

15 MIGUEL MÁRQUEZ
 16 Acting County Counsel

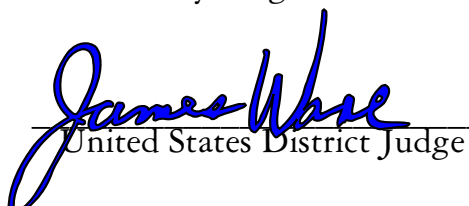
17 By: /S/
 18 Aryn Paige Harris, Deputy County Counsel
 Attorneys for Defendants County of Santa Clara,
 19 Santa Clara Valley Medical Center, Santa Clara
 County Sheriff's Office, Deputy Sheriffs Jensen
 20 #1765, Palinov #1864, Clark #1676, and
 Fernandes #2013

21 MANNING & MARDER
 22 KASS, ELLROD, RAMIREZ LLP

23 By: /S/
 24 Eugene P. Ramirez
 Attorney for Defendants City of Campbell,
 Campbell Police Department, and
 25 ~~ORDER~~ Officer Gary Berg #63

26 IT IS SO ORDERED.

27 Dated: June 29, 2010

28 
 United States District Judge